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 SPECTRUM LABORATORIES, LLC

**UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEVADA**

AIM HIGH INVESTMENT GROUP,)
 LLC,)
)
 Plaintiff/Counter-Defendant,)
)
 v.)
)
 SPECTRUM LABORATORIES, LLC)
)
 Defendant/Counterclaimant.)

Case No. 2:22-cv-00158-GMN-DJA

**STIPULATION TO EXTEND
 DEADLINE FOR NON-PARTIES
 S&N LABS AND ELEMENT TO
 OPPOSE AIM HIGH'S MOTION TO
 COMPEL [ECF #20]**

(First Request)

In accordance with LR IA 6-1 and LR 7-1, the parties, through their respective counsel, stipulate to extend the time for non-parties S&N Labs ("S&N") and Element Santa Fe Springs ("Element") to oppose Plaintiff Aim High Investment Group, LLC's ("Aim High's") Motion to Compel Response to Subpoena Duces Tecum (ECF #20) by seven days, until 9:00 a.m. (PDT), July 15, 2022. This is the first stipulation for extension of this deadline.

1. On June 24, 2022, Aim High moved to compel S&N and Element to respond to their respective subpoenas duces tecum that sought production of documents.

2. By rule, Element's and S&N's opposition to that motion is due within 14 days, *i.e.*, by July 8, 2022.

3. S&N and Element, however, need additional time to draft their opposition briefs due to a family vacation during the week of June 27, 2022, by the S&N and Element attorney most familiar with the issues and due to the impact of the July 4 Holiday on work schedules for S&N's and Element's counsel.

4. All parties, including the movant Aim High, and non-parties agree and stipulate that S&N and Element may have an additional seven days to oppose, until 9:00 a.m. (PDT), July 15, 2022.

5. This requested extension of time is not sought for delay or any other improper purpose, but instead is sought due to a genuine need for more time.

6. The parties and non-parties respectfully submit that the reasons set forth above constitute good cause of the extension.

DATED this 7th day of July, 2022

DATED this 7th day of July, 2022

MCDONALD HOPKINS LLC

GILE LAW GROUP, LTD.

/s/ Matthew J. Cavanagh
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Spectrum Laboratories, LLC*

*Attorneys for Plaintiff/Counter-Defendant
Aim High Investment Group, LLC*

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: July 8, 2022

CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2022, the foregoing was served automatically to all counsel of record via the Clerk's CM/ECF system.

/s/ Matthew J. Cavanagh
Matthew J. Cavanagh
Counsel for Defendant/Counterclaimant
Spectrum Laboratories, LLC